

Jessica L. Grant (SBN: 178138)
jgrant@shb.com
SHOOK, HARDY & BACON L.L.P.
555 Mission Street, Suite 2300
San Francisco, CA 94105
Telephone: (415) 544-1900
Facsimile: (415) 391-0281

Michelle M. Fujimoto (SBN: 125462)
mfujimoto@shb.com
Mayela C. Montenegro-Urch (SBN: 304471)
mmontenegro@shb.com
Paulina N. Tran (SBN: 337946)
ptran@shb.com
SHOOK, HARDY & BACON L.L.P.
Jamboree Center
5 Park Plaza, Suite 1600
Irvine, California 92614
Telephone: (949) 475-1500
Facsimile: (949) 475-0016

Attorneys for Defendants
UBER TECHNOLOGIES, INC.;
RASIER, LLC; and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**JOINT DISCOVERY LETTER BRIEF
REGARDING BELLWETHER
PLAINTIFF LCHB 128 AND SOCIAL
MEDIA PRODUCTION**

This Document Relates to:

LCHB 128 v. Uber Technologies, Inc., et al. [Case No. 3:24-cv-07019]

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

The Court's Order Resolving Joint Discovery Letter Regarding Requests to Bellwether Plaintiffs (ECF 3136), which specifically addressed disputes regarding social media, directed the parties to raise any remaining disputes about the scope of social media discovery through a joint letter. Pursuant to the Court's Order, the parties have met and conferred. The parties in *LCHB 128 v. Uber Technologies, Inc., et al.* [Case No. 3:24-cv-07019] are pleased to report that they have reached agreement as to the scope and timing of Plaintiff's social productions. No current dispute exists on those issues between the parties in this particular case.

DATED: June 6, 2025

Respectfully submitted,

/s/ Christopher V. Cotton

CHRISTOPHER V. COTTON (Admitted *Pro Hac Vice*)

SHOOK, HARDY, & BACON L.L.P.
2555 Grand Blvd,
Kansas City, MO 64108
Email: ccotton@shb.com

Attorney for Defendants
UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC

By: /s/ Simon Grille

Simon Grille (State Bar No. 294914)

GIRARD SHARP LLP
601 California Street, Suite 1400
San Francisco, California 94108
Telephone: (415) 981-4800
Facsimile: (415) 981-4846
Email: sgrille@girardsharp.com

Attorneys for Plaintiff